

PATTON BOGGS, L.L.P.  
2550 M STREET, N.W.  
WASHINGTON, D.C. 20037-1350  
(202) 457-6000  
FACSIMILE (202) 457-6315

WRITER'S DIRECT DIAL

(202) 457-6405

April 25, 1996

Lawrence M. Noble, Esquire  
General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Attn: Mary L. Taksar, Esquire

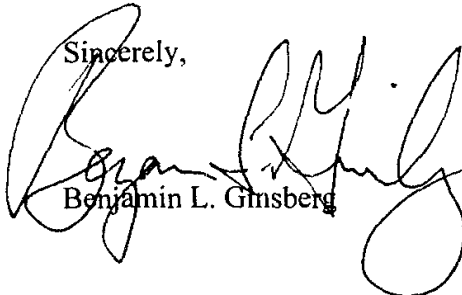
Re: MUR 4323 -- Huckabee U.S. Senate Election Committee and  
Prissy Hickerson, as Treasurer

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
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Dear Mr. Noble:

Our initial response to MUR 4323 included a copy of an affidavit submitted by Ms. Brenda Turner. Enclosed as a supplement to this initial filing is the original affidavit signed by Mrs. Turner.

Sincerely,

  
Benjamin L. Ginsberg

STATE OF ARKANSAS  
CITY OF TEXARKANA

AFFIDAVIT OF BRENDA TURNER

Brenda Turner, being duly sworn, deposes and states as follows:

1. I am Brenda Turner and I served as the Campaign Director for the successful 1994 campaign of Mike Huckabee for the office of Lieutenant Governor in the State of Arkansas.

2. Given my position as Campaign Director of Mr. Huckabee's 1994 campaign for Lt. Governor in Arkansas, after the election I assumed responsibility for ensuring that all outstanding debts stemming from this campaign were settled in an appropriate manner so as to close out our books and banking activity. In order to fully comply with an Arkansas law prohibiting fundraising activities during a state legislative session, it was not until May of 1995 that we began our fundraising efforts to help retire the debt from this campaign.

3. The main fundraising vehicle was a two-page debt retirement letter sent in May of 1995 to Lt. Governor Huckabee's supporters. This letter related solely to debt retirement for the 1994 Lt. Governor's race. It never directly or indirectly mentions the U.S. Senate seat in Arkansas being vacated by Senator Pryor.

4. Attached to this debt retirement letter was a ten-question opinion survey intended to provide Lt. Governor Huckabee with an understanding of his constituents' views on a wide-range of key state issues, including school consolidation, highway taxes, sales taxes on food, an informed consent law, overhauling of the welfare system, the death penalty, drunk-driving laws, and certain amendments to the Arkansas Constitution. Given that Senator Pryor had announced his intention to retire from the U.S. Senate only days earlier on April 21, 1995, one question in this survey asked for an opinion as to whether or not Lt. Governor Huckabee should consider running for the seat.

5. Because the sole purpose of the mailing comprised of the letter and the survey was to raise funds to retire the debt from his state election campaign and to obtain constituent views on a variety of important state issues, it was paid for out of Lt. Governor Huckabee's state account. Neither the letter nor the survey were sent for the purpose of "testing the waters" regarding a possible U.S. Senate bid. Indeed, given the level of speculation and press coverage surrounding Mr. Pryor's announcement, the one brief question out of this four-page mailing as to who would succeed him was a legitimate state issue of concern to the Lt. Governor's office.

6. One of the largest outstanding debts from the 1994 Lt. Governor's race was approximately \$15,000 owed to Mr. Richard Morris for political consulting services. In order to settle this debt, several attempts were made in the early summer of 1995 to arrange a meeting in Arkansas between Mr. Morris, Lt. Governor Huckabee and myself. However, once indictments

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were handed down on Governor Tucker and Mr. Starr's Whitewater investigation got under way, Mr. Morris felt it would be best for him to avoid traveling to Arkansas given his past role as an advisor for President Clinton. Thus, it was agreed that it would be best to conduct our meeting outside of Arkansas in Washington, D.C.

7. Initial planning of a trip to Washington, D.C. for Lt. Governor Huckabee and me to meet with Mr. Morris began in June of 1995 and our plane tickets were purchased in early July. The actual dates of our trip to Washington were August 1-3, 1995.

8. During this trip, Lt. Governor Huckabee and I met with Mr. Morris on August 1, 1995 and again on August 2, 1995. At the conclusion of the August 2nd meeting, Mr. Morris agreed to forgive the debt owed to him.

9. As previously stated, the sole purpose of this trip was to meet with Mr. Morris regarding amounts owed to him stemming from the 1994 Lt. Governor's race. However, given that we had substantial time on our hands during our trip and that Lt. Governor Huckabee had gained some national recognition for being the first Republican to win a state-wide election in President Clinton's home state, Lt. Governor Huckabee took the opportunity to make courtesy visits with several prominent Republican leaders, conservative organizations and members of the press, including Senator Dole, Speaker Gingrich, Majority Leader Arney, Senator Faircloth, the National Republican Senatorial Committee, the Senate Steering Committee comprised of conservative U.S. Senators, Washington Post columnist David Broder, and political commentator Fred Barnes.

10. In light of the political and legal events in Arkansas, it is not surprising that during these various meeting Lt. Governor Huckabee was often asked informally about: (1) the events in Arkansas relating to Governor Tucker and the possibility that he could become governor if Tucker were convicted; (2) Mr. Starr's Whitewater investigation; and (3) potential candidates to succeed Senator Pryor and for other offices in Arkansas.

11. I state unequivocally that the trip to Washington, D.C. was in no way a "testing the waters" activity conducted to determine whether Lt. Governor Huckabee should become a candidate for the open U.S. Senate seat in Arkansas. Beyond the informal questions Lt. Governor Huckabee was asked regarding the open U.S. Senate seat in Arkansas, no discussions or meetings occurred for the purpose of determining whether Lt. Governor Huckabee should become a candidate. In fact, the Washington, D.C. trip occurred over a week before Lt. Governor Huckabee decided to even entertain the idea of running for the U.S. Senate by forming an exploratory committee on August 10, 1995. It was not until October 25, 1995 that Lt. Governor Huckabee announced his intention to run for the U.S. Senate.

10. I would also like to state for the record that Lt. Governor Huckabee has always placed top priority on full compliance with all federal and state election laws. It is extremely disappointing that Lt. Governor Huckabee's political opponents are now attempting to gain political advantages by leveling a completely frivolous and speculative complaint against him. It

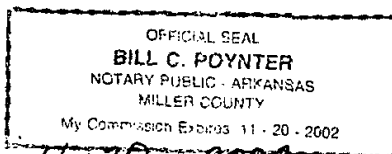
is my sincere hope that the Federal Election Commission will see through this baseless complaint and promptly dismiss it.

*Brenda Turner*

Brenda Turner

Sworn to and subscribed before me  
on this 22 day of April 1996.

*Bill C. Poynter*  
Notary Public



My Commission expires:

11-20-2002

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